

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS

JUDY FAHRNER, individually, and on behalf of  
all others similarly situated

Plaintiff,

v.

RAYMOND BITAR; NELSON BURTNICK;  
FULL TILT POKER LTD.; TILTWARE LLC;  
VANTAGE, LTD; FILCO, LTD.; KOLYMA CORP.  
A.V.V.; POCKET KINGS LTD.;  
POCKET KINGS CONSULTING LTD.;  
RANSTON LTD.; MAIL MEDIA LTD.;  
HOWARD LEDERER; PHILLIP IVEY JR.;  
CHRISTOPHER FERGUSON; JOHNSON JUANDA;  
JENNIFER HARMON-TRANIELLO;  
PHILLIP GORDON;ERICK LINDGREN; ERIK SEIDEL;  
ANDREW BLOCH; MIKE MATUSOW;  
GUS HANSEN; ALLEN CUNNINGHAM;  
PATRIK ANTONIUS; RAFAEL FURST;  
RATIONAL FT ENTERPRISES LIMITED

Defendants.

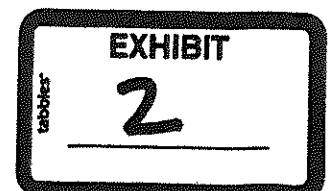
Case No.: \_\_\_\_\_

JURY TRIAL DEMANDED

AFFIDAVIT OF A. JEFF IFRAH

I, A. Jeff Ifrah, declare as follows:

1. I am over 18 years old and competent to testify to the matters set forth in this Affidavit.
2. I am counsel for Defendants Tiltware LLC ("Tiltware") and Erik Seidel.
3. On or about July 11, 2012, Plaintiff Judy Fahrner ("Plaintiff") commenced this action against Defendants by filing a Complaint in the Circuit Court for the Twentieth Judicial Circuit, St. Clair County, Illinois, cause number 12-L-354 ("Original Complaint"). A copy of the Original Complaint was never served on Defendants.



4. On or about January 25, 2013, Plaintiff filed a First-Amended Complaint in the Circuit Court for the Twentieth Judicial Circuit, St. Clair County, Illinois, cause number 12-L-354 ("State Court Action"). Defendants Tiltware and Erik Seidel first received the First-Amended Complaint on February 6, 2013, when they were served with process.

5. Defendants are removing this matter based on diversity jurisdiction pursuant to 28 U.S.C. §§ 1332, 1441, 1446 and 1453.

6. Defendant Erik Seidel is (and was at all relevant times hereto) a citizen of the State of Nevada.

7. Defendant Tiltware is (and was at all times relevant hereto) a California limited liability company and a citizen of California.

8. The members of Tiltware are all diverse in citizenship to Plaintiff and are citizens of states other than Illinois. The Tiltware members include:

- a. Raymond Bitar – Raymond Bitar is (and was at all relevant times hereto) a citizen of the State of California.
- b. Rafael Furst – Rafael Furst is (and was at all relevant times hereto) a citizen of the State of California.
- c. Christopher Ferguson – Christopher Ferguson is (and was at all relevant times hereto) a citizen of the State of Nevada.
- d. Steve Brecher – Steve Brecher is (and was at all relevant times hereto) a citizen of the State of Nevada.
- e. Lederer Family Trust c/o Howard Lederer – Howard Lederer is (and was at all relevant times hereto) a citizen of the State of Nevada.

- f. Grey Family Trust c/o David Grey – David Grey is (and was at all relevant times hereto) a citizen of the State of Nevada.
- g. Andrew Bloch – Andrew Bloch is (and was at all relevant times hereto) a citizen of the State of Nevada.
- h. David Oppenheim – David Oppenheim is (and was at all relevant times hereto) a citizen of the State of California.
- i. David Hyatt – David Hyatt is (and was at all relevant times hereto) a citizen of the State of New York.
- j. Erick Lindgren – Erick Lindgren is (and was at all relevant times hereto) a citizen of the State of Nevada.
- k. Erik Seidel – Erik Seidel is (and was at all relevant times hereto) a citizen of the State of Nevada.
- l. Greg Mascio – Greg Mascio is (and was at all relevant times hereto) a citizen of the State of California.
- m. John Juanda – John Juanda is (and was at all relevant times hereto) a citizen of the State of Nevada.
- n. Gustav Hansen – Gustav Hansen is (and was at all relevant times hereto) a citizen of country of Monaco.
- o. Jennifer Harman-Traniello – Jennifer Harman-Traniello is (and was at all relevant times hereto) a citizen of the State of Nevada.
- p. Keith Sexton – Keith Sexton is (and was at all relevant times hereto) a citizen of the State of Nevada.

- q. Scheinberg Living Trust c/o Martin & Kim Scheinberg – Martin & Kim Scheinberg are (and were at all relevant times hereto) citizens of the State of New York.
- r. Kleinrock 1990 Trust c/o Leonard Kleinrock – Leonard Kleinrock is (and was at all relevant times hereto) a citizen of the State of California.
- s. Perry Friedman – Perry Friedman is (and was at all relevant times hereto) a citizen of the State of Nevada.
- t. William Forest – William Forest is (and was at all relevant times hereto) a citizen of the State of Nevada.
- u. Philip Gordon – Philip Gordon is (and was at all relevant times hereto) a citizen of the State of Washington.
- v. Philip Ivey, Jr. – Philip Ivey Jr. is (and was at all relevant times hereto) a citizen of the State of Nevada.
- w. Wolf Living Trust c/o Robert Wolf – Robert Wolf is (and was at all relevant times hereto) a citizen of the State of Nevada.

9. Accordingly, there is complete diversity between Plaintiff and Defendants Tiltware and Erik Seidel.

10. All of the Defendants known to these removing Defendants Tiltware and Erik Seidel, who have been served with process in the State Court Action, have joined in this Notice of Removal. Other than Defendants Tiltware and Erik Seidel, the only Defendants in the State Court Action known to have been served with process are Defendants Howard Lederer and Allen Cunningham. Defendant Howard Lederer is (and was at all relevant times hereto) a citizen of

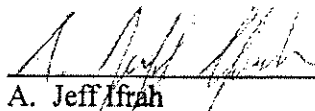
the State of Nevada. Defendant Allen Cunningham is (and was at all relevant times hereto) a citizen of the State of Nevada.

11. I have diligently attempted to ascertain the identities of all served Defendants to confirm their consent to removal of this matter to this Court. I have reviewed the State Court Action to determine whether any returns of service have been filed. As of the date of the Notice of Removal, a return of service has been filed with in the State Court Action as to Tiltware LLC only. I have also contacted the other Defendants to determine whether they have been served with process in this case.

12. Defendants Howard Lederer and Allen Cunningham are the only two defendants known to me who have been served with process in this case. Defendants Lederer and Cunningham have both indicated to me that they consent to removal of the State Court Action to this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 3/7/13

  
A. Jeff Ifrah

Subscribed and sworn to before me this 7 day of March, 2013.

  
Notary Public

My Commission Expires: 8/31/2017

